

Table of Contents

1.0 Site-Spec	ific Monitoring Methods3
1.1 Optica	l Gas Imaging Equipment3
1.2 Daily V	erification Check
1.3 Site Ma	ap and Observation Path3
1.4 Difficul	lt-to Monitor (DTM) and Unsafe-to-Monitor (UTM) Components3
1.5 Thoma	ston Facility Surveys and Repairs3
1.6 Thoma	ston Facility Repair Tracking4
2.0 Tables	5
Table 1	Site Layout Map/Observation Path Maps
Table 2	Daily Verification Check
Table 3	Quarterly Fugitive Emissions Survey Summary Report
Table 4	Quarterly Fugitive Emissions Survey Repair Checklist

1.0 Site-Specific Monitoring Methods

The Southern Natural Gas Thomaston, GA compressor station (Thomaston Facility) must comply with the OOOOa monitoring requirements set forth in the Fugitive Emissions Monitoring Plan. The purpose of this appendix is to give a detailed account of how the Thomaston Facility will comply with these requirements.

1.1 Optical Gas Imaging Equipment

Fugitive monitoring surveys will be performed by a third-party contractor or by an in-house technician. The Operator will be a trained infrared thermographer and will perform the surveys using OGI, specifically with a FLIR GF-320 camera. This camera meets the 60.5397a (c)(7) OGI requirements and can be used to perform the quarterly surveys. If a GF-320 camera is not available, other cameras that can identify fugitive emissions will be used.

1.2 Daily Verification Check

The requirements of 60.5397a (c)(7) state that a daily verification check must be performed. Prior to starting the survey, the Operator will perform the daily verification check (see Table 2) to ensure that the camera can properly identify fugitive emissions during the survey. The atmospheric conditions, maximum viewing distance, wind speed, and other factors will be noted during the daily verification check.

1.3 Site Map and Observation Path

60.5397a (d)(1-2) dictates that a site map and a defined observation path must be included in the Plan. In order to more easily show the observation path that will be used during the surveys, aerial photographs of the site were taken (see Table 1). Different areas of the facility are shown, as are the observation path for each area. No deviations were noted during the initial setup; however, any deviations that may occur during the surveys will be noted, as well as the reason for the deviation and the corrective action that was taken.

1.4 Difficult-to Monitor (DTM) and Unsafe-to-Monitor (UTM) Components

60.5397a (d)(4) states that any components that are designated as DTM or UTM must be identified as to why they are DTM or UTM and must be monitored at least once per year. The Thomaston Facility has not identified any components as DTM or UTM.

1.5 Thomaston Facility Surveys and Repairs

Once a fugitive emission is identified by the Operator, it will be flagged with a leak tag. The date, component type, and a description of the emission will be noted on the tag. Thomaston Facility personnel will be notified and will immediately make a first attempt of repair. If a repair

is made, the Operator will re-survey the repaired component to verify if the repair was made. If the component is repaired, it will be noted in the Quarterly Fugitive Emissions Survey Summary Report (see Table 3). If an immediate repair cannot be made during the survey, the Thomaston Facility will make a first attempt as soon as practical but no later than 30 days after the date of the survey. Once this repair is made, Thomaston Facility personnel will perform a re-survey on the leaking component using a soap and water solution. If there are no observable bubbles, the leak will be noted as repaired. If bubbles do exist, additional repair attempts will be made until no bubbles are observed. Thomaston Facility personnel will decide if a repair is technically infeasible or if a facility blowdown must occur to repair the component.

All repair information can be found in the Quarterly Fugitive Emissions Survey Repair Checklist (see Table 4).

1.6 Thomaston Facility Repair Tracking

If a leak cannot be immediately repaired and verified to be free of leaks during the survey, then all information for the leak will be entered by Thomaston Facility personnel into their MAXIMO leak tracking database. The Operator will work with Thomaston Facility personnel to document that all repairs are made within 30 days of the survey and that re-surveys are made within 30 days 60.5397a (h)(3) to verify the repairs were made.

2.0 Tables

Table 1 Site Layout Map/Observation Path Maps



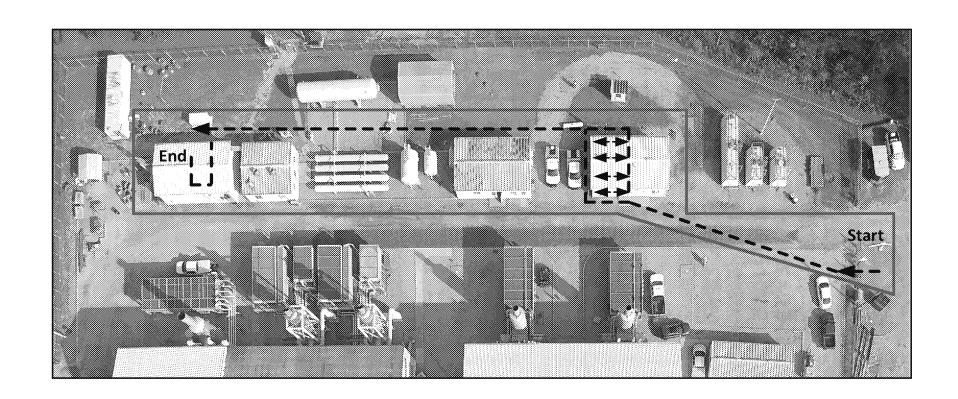
Area Border



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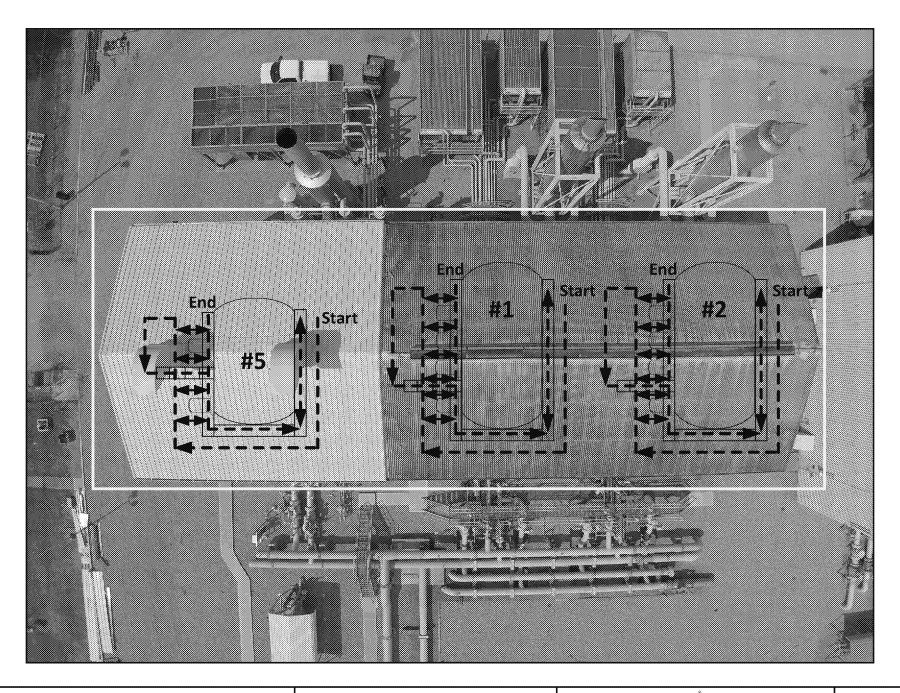
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Thomaston, GA Compressor Station Fugitive Emissions Site Layout Map





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Thomaston, GA Compressor Station Area 1 -	Figure 1





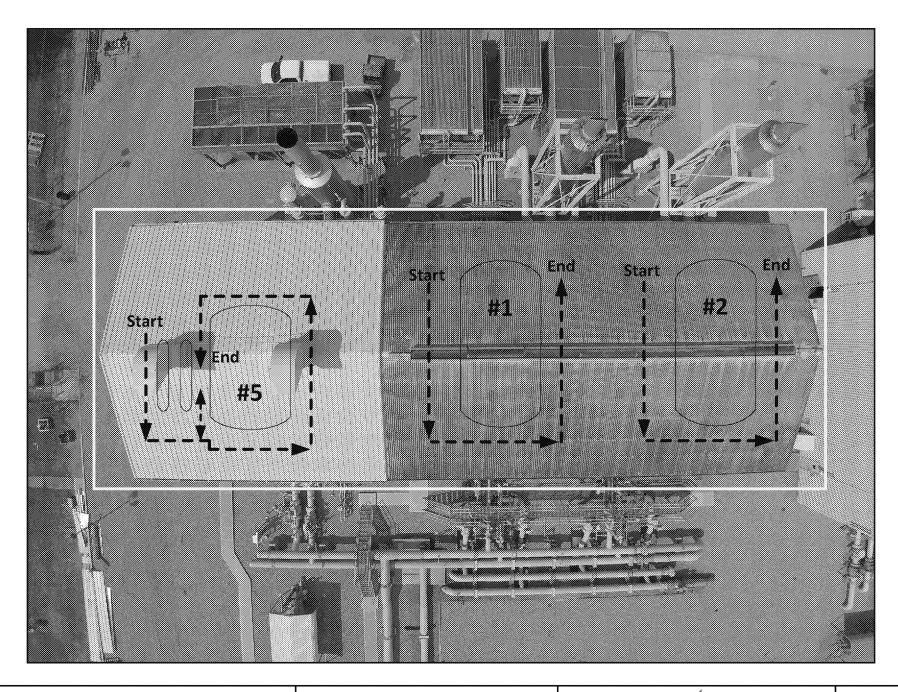


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Thomaston, GA Compressor Station Area 2A – Operating Floor

Figure 2A





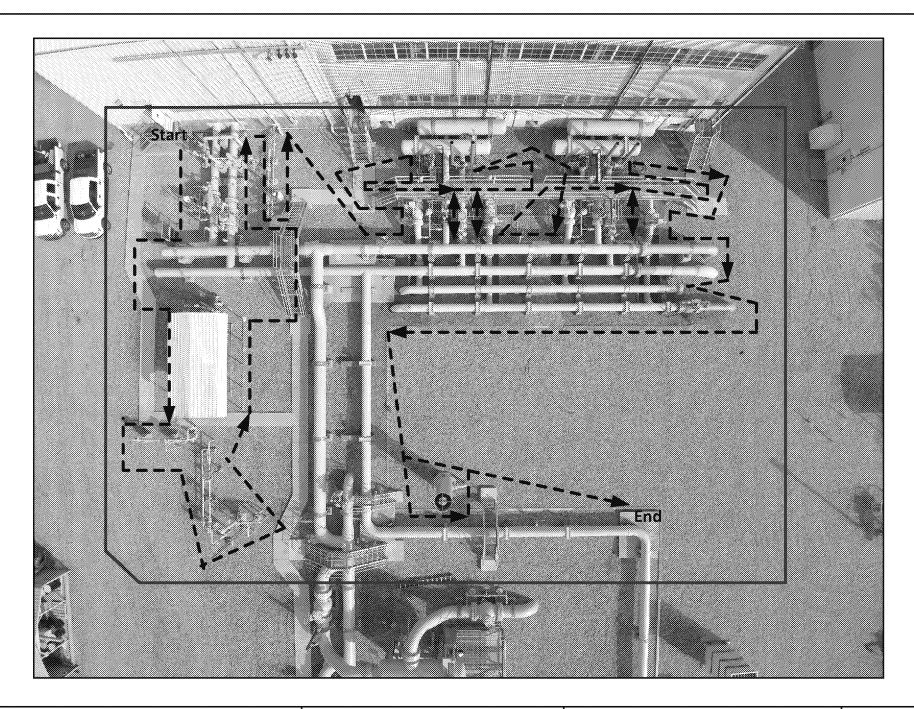
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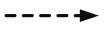
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Thomaston, GA Compressor Station Area 2B - Basement

Figure 2B



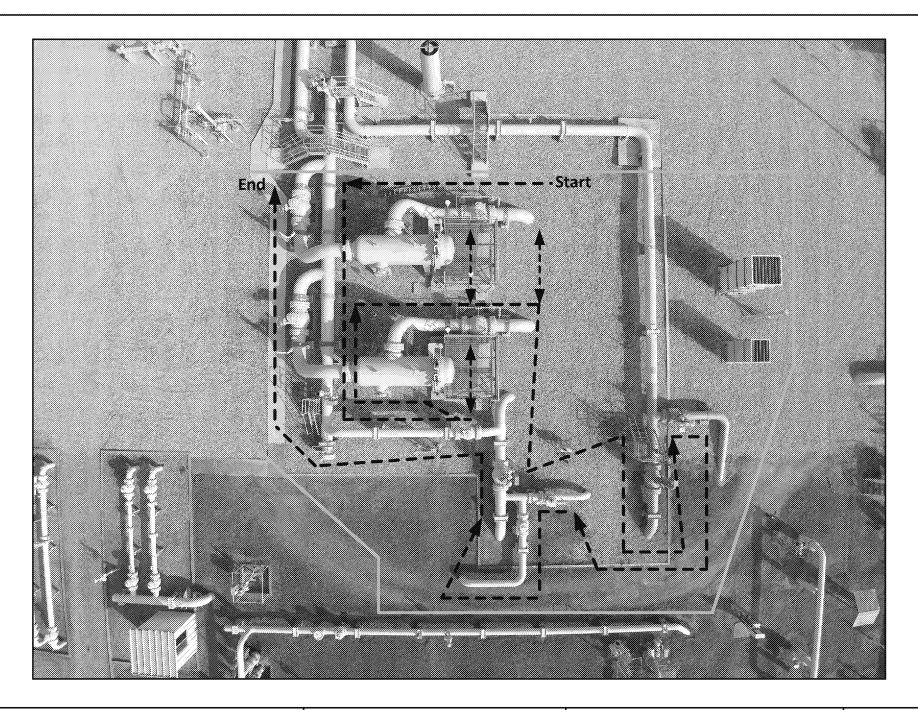




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Thomaston, GA Compressor Station Area 3 -



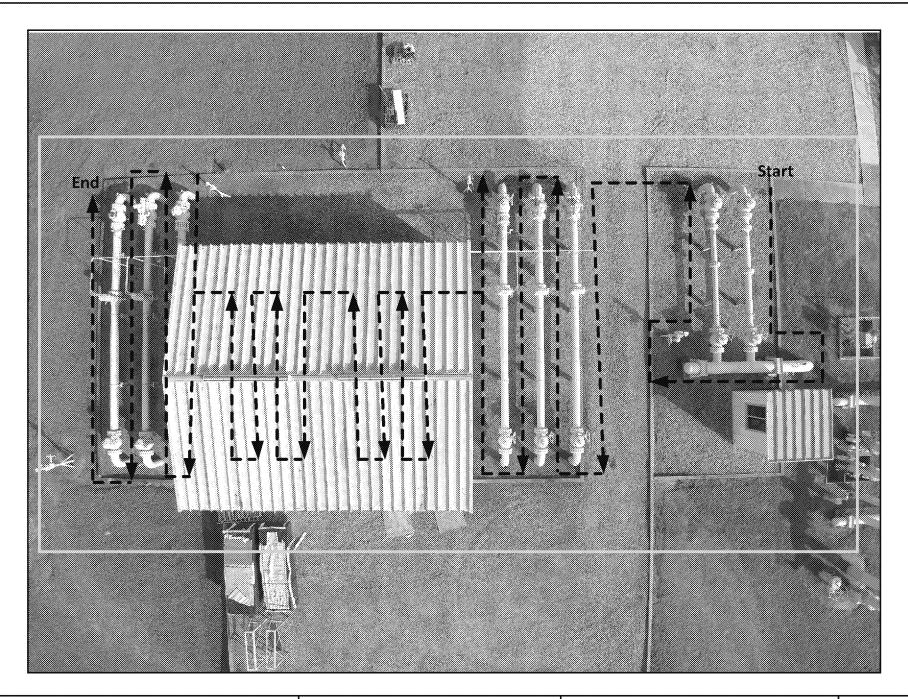




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Thomaston, GA Compressor Station
Area 4-



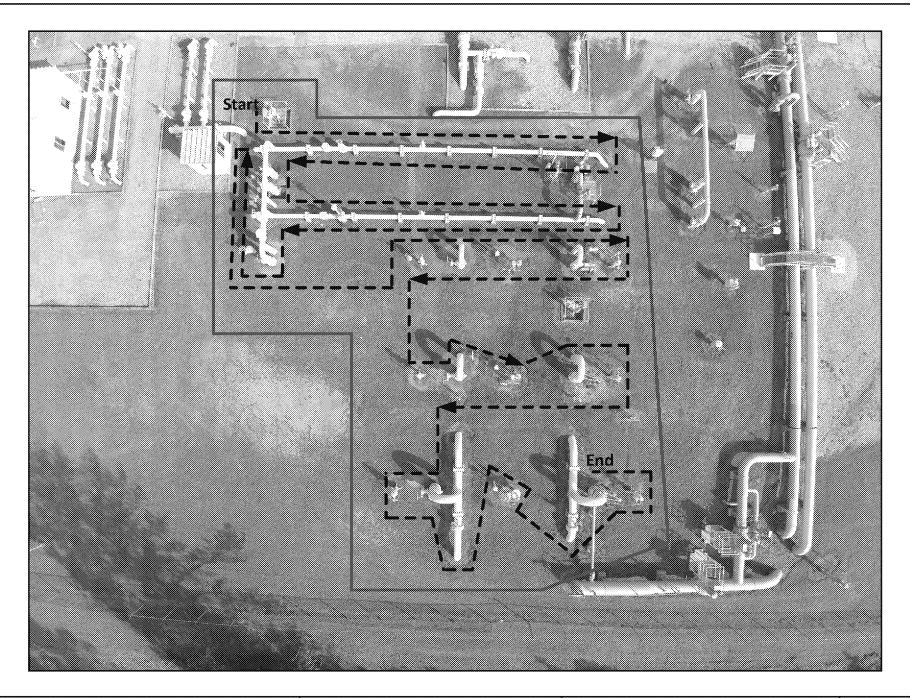


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Thomaston, GA Compressor Station
Area 5 -

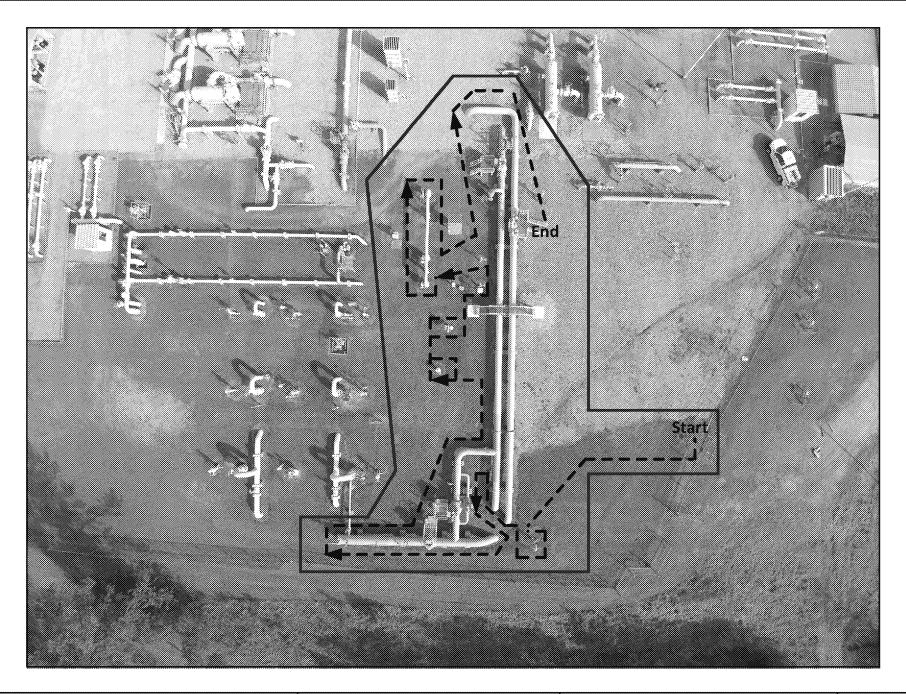




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Thomaston, GA Compressor Station Area 6 -

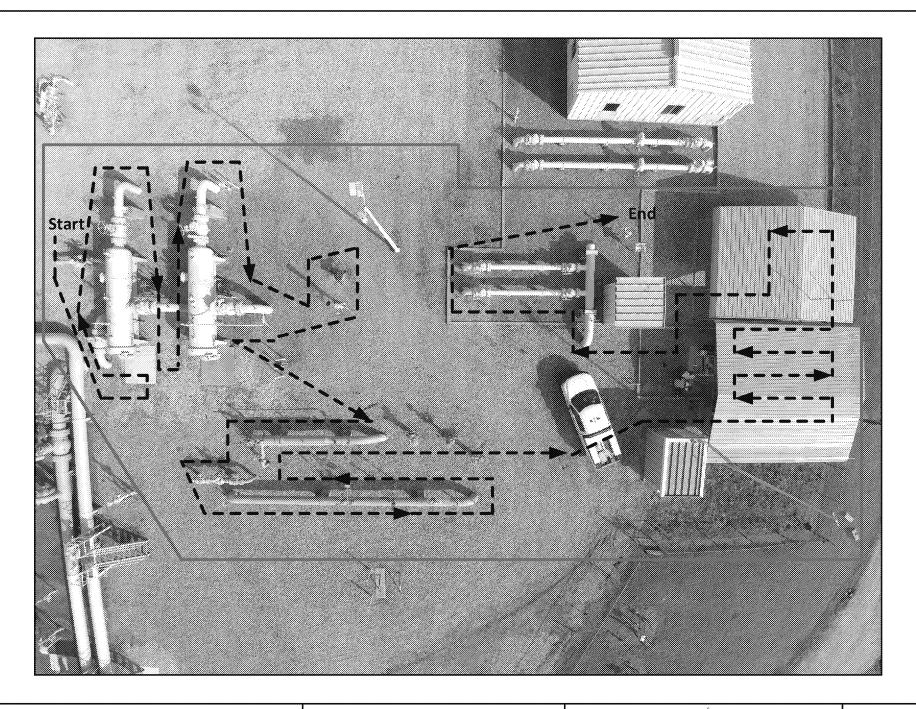




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Thomaston, GA Compressor Station Area 7 -



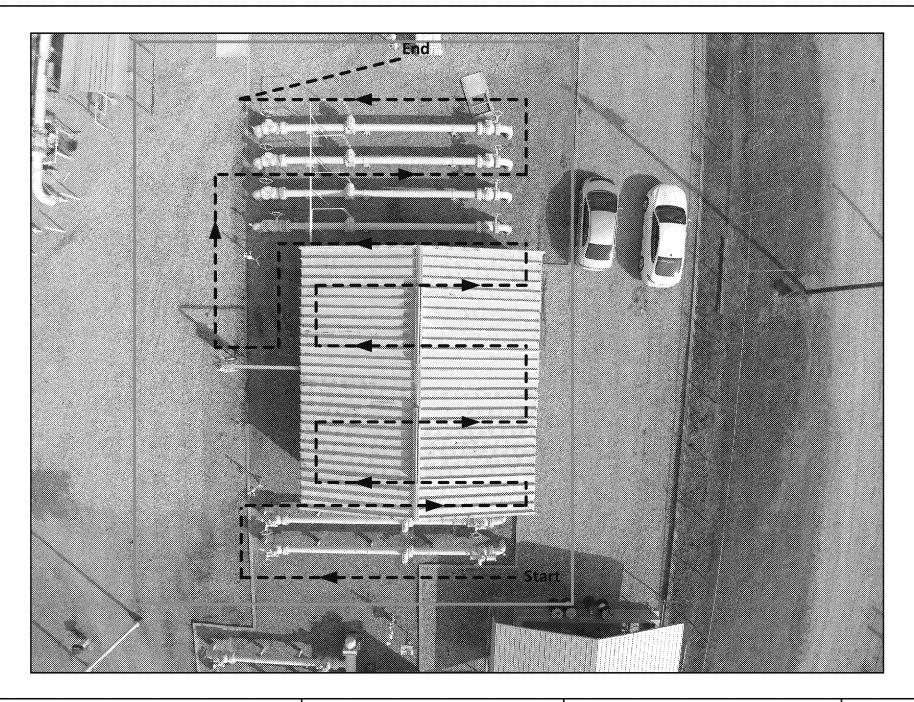




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Thomaston, GA Compressor Station Area 8 -

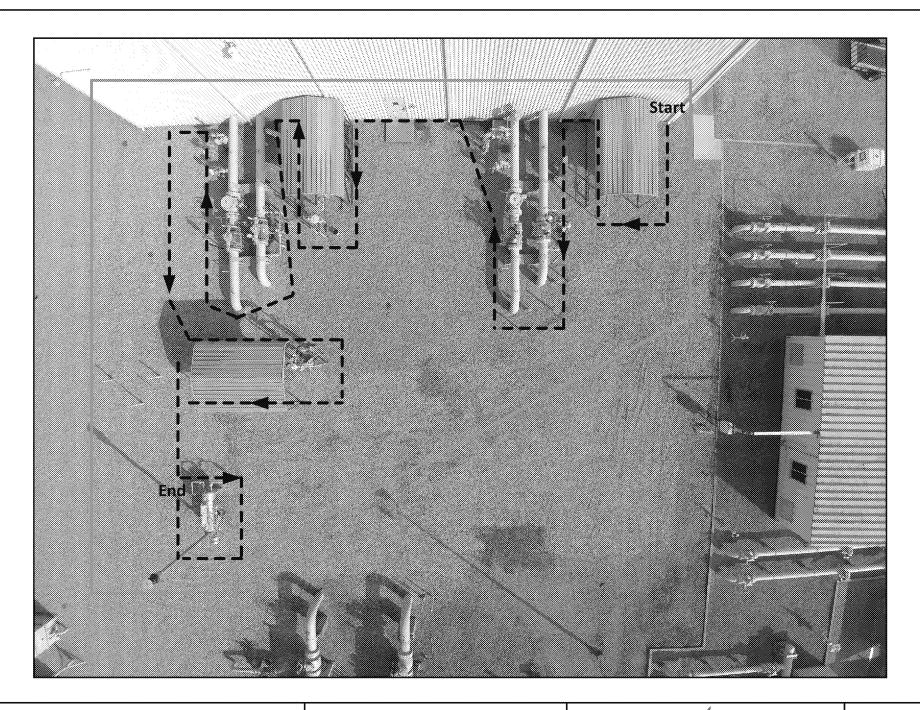




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Thomaston, GA Compressor Station
Area 9 -



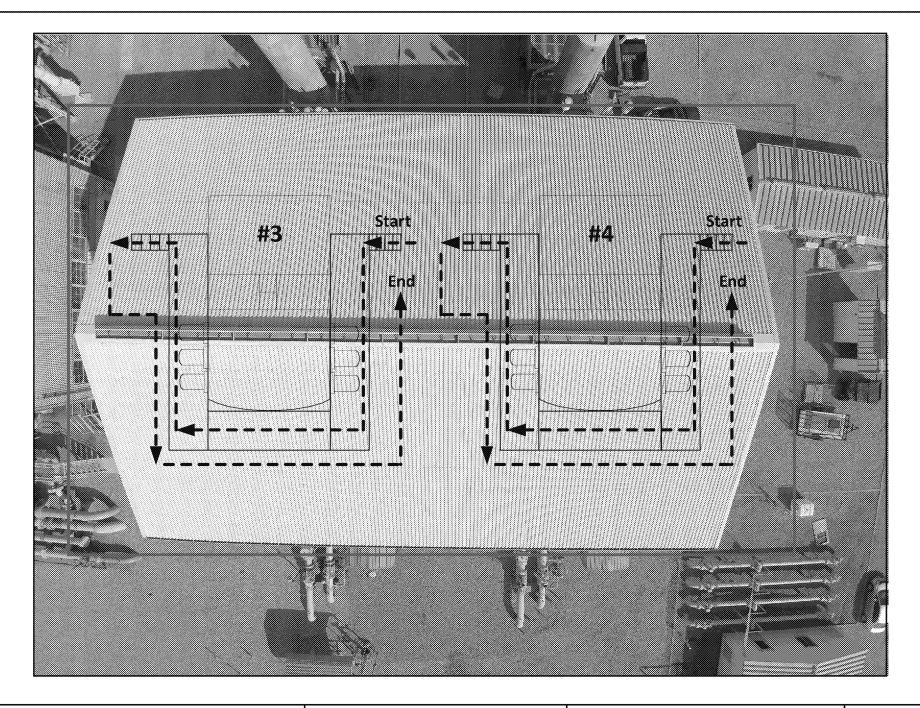




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Thomaston, GA Compressor Station Area 10 -



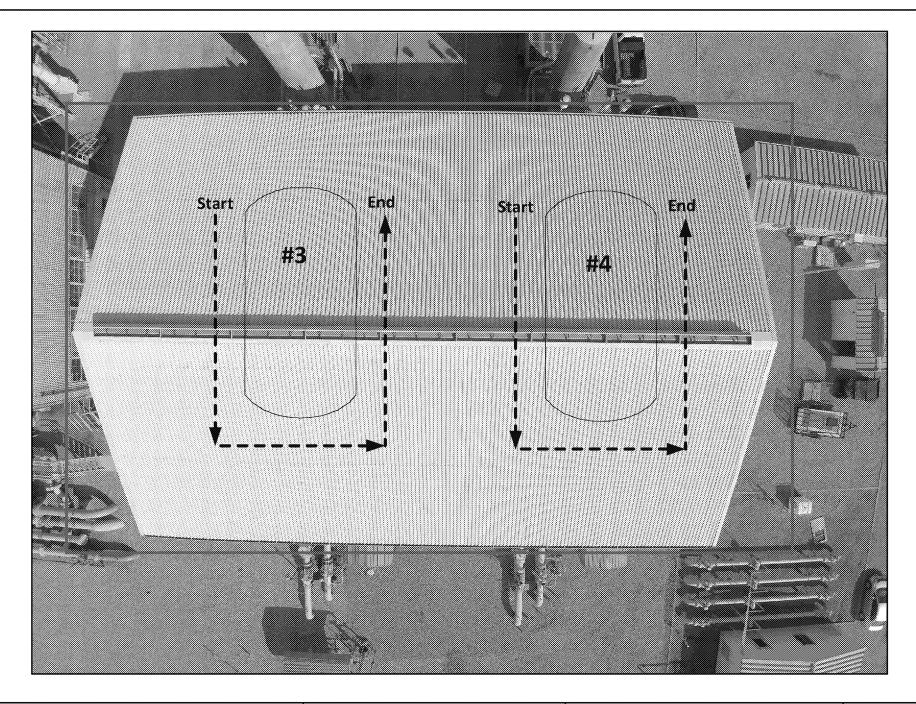


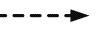
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Thomaston, GA Compressor Station Area 11 – Operating Floor

Figure 11A







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Thomaston, GA Compressor Station
Area 11 - Basement

Figure 11B

Table 2	Daily	Verification	Check

Daily Verification Check

Client:	
Inspector Name(s):	
Company:	
Date:	
Start Time:	
Ambient Temperature:	
Atmospheric Conditions:	
Time of Initial NUC Test:	
Description of Gas Release:	
Viewing Distance:	Note: Camera operator will stay within this distance at all times during the inspection, unless a condition arises that causes a deviation. If this
Maximum Viewing Distance:	occurs, a new verification for this distance will take place.
Initial Wind Speed:	Note: Camera operator will account for significant increases in wind speed during the inspection and make the necessary adjustments to the proper viewing distance.
Camera Model: Camera Serial Number: Camera Lens Length: Field of View:	
Time(s) of Subsequent NUC Tests and Description	on:
End Time:	
Max Wind Speed:	
Comments:	
Signed:	

Table 3 Quarterly Fugitive	Emissions Survey Sumn	nary Report	
	-		

Inspection Date:				
Southern Natural Gas - Thomaston Compressor Station 5276 Hwy 19 S Thomaston, GA 30286	1			
Fugitive Emissions Summary Report				
Were there any deviations from the monitoring plan and/or observation path?	No:	_ Yes:		
If yes, list deviations and corrective actions:				

Inspection Summary Table

Date	Component Type	Area #	Unit # or Station	Tag#	GPS Coordinates	Description/Location of Fugitive Emission

 		 ·	
	•		

P	78.T B 4° BT 7 * 4 *
Component	Number of Fugitive
Type	Emissions
Valves	
Connectors	
Pressure Relief Device	
Open-Ended Line	
Flanges	
Covers & Closed- Vent Systems*	
Thief Hatches	
Compressors	
Instruments	
Meters	
Other	

^{*}Those not subject to 60.5411a

I certify that the results	of the visual inspection	are accurate and complete to the	best of my knowledge.

Inspector Name:	
Signature:	

Table 4 Quarterly Fugitive Emissions Survey Repair Checklist					

Quarterly LDAR Fugitive Emissions Survey Repair Summary SURVEY INSPECTION NOTES						
Inspection Date	Component Type	Area #	Unit # or Station	Tag #	GPS Coordinates	Description/Location of Fugitive Emission

Quarterly LDAR Fugitive Emissions Survey Repair Summary						
Repair Date	Maximo ID	Within 30 Days of Survey?	Does Repair Require Blowdown?	Date of Next Scheduled Blowdown	Method of Repair	Repaired By

Quarterly LDAR Fugitive Emissions Survey Repair Summary							
REPAIR RE-SURVEY							
Date of Repair Re- Survey	Within 30 Days of Repair?	Method of Repair Re- Survey	Re-Surveyed By				